

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
)	
V.)	CRIMINAL CASE NO. 12-CR-61-PB
)	
TOSATTI PADMORE,)	
)	
Defendant)	

ASSENTED TO MOTION FOR TEMPORARY RELEASE AND TRANSPORT TO FUNERAL

NOW COMES the defendant, Tosatti Padmore, by and through counsel, Paul J, Garrity and hereby moves this Court to authorize his temporary release from the Strafford County House of Corrections for the purposes of attending his mother's funeral and for transportation, at his own expense, by the United States Marshall's Office to the funeral.

In support of this motion, the defendant states as follows:

1. The defendant is currently detained at the Strafford County House of Corrections.
2. His mother, Anna Z. Johnson, died on May 9, 2013.
3. Her funeral is scheduled for May 15, 2013 from 8:15 to 11:00 a.m. at the Boufford Funeral Home located at 10 Bridge Street, in Manchester, NH.
4. The United States Attorney's Office has no objection to this motion. In addition, the Government contacted the United States Marshall's Office regarding this issue. The Marshall's Office informed the Government that in order for the defendant to attend the funeral, the Court would first have to authorize such temporary release and that the defendant would have to pay for his transportation by the Marshall's Office to the funeral. In addition, the defendant would only be allowed to attend for at most one hour and no other family members could be present. The defendant and his family are prepared to pay for such transportation and to comply with the above conditions.

WHEREFORE, the defendant respectfully moves this Court grant the within motion and authorize his temporary release and transportation to his mother's funeral.

Respectfully submitted
Tosatti Padmore,

By his Attorney,

Date: May 14, 2013

/S/Paul J. Garrity
Paul J. Garrity
Bar No. 905
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 14th day of May, 2013, a copy of the within was e filed to the United States Attorney's Office, parties of record and mailed, postage prepaid, to Tosatti Padmore.

/S/Paul J. Garrity
Paul J. Garrity